

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

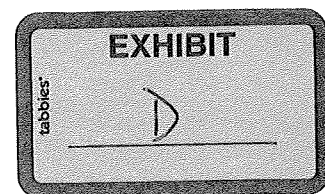
LISA BROWN, M.D.,)	Civil Action No. 05-32E
)	Judge Maurice B. Cohill, Jr.
Plaintiff,)	
)	
v.)	ELECTRONICALLY FILED
)	
HAMOT MEDICAL CENTER,)	
)	
Defendant.)	

AFFIDAVIT OF DANA ASHLEY

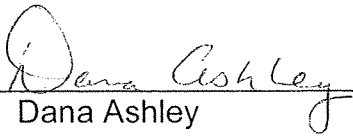
Dana Ashley deposes and states to following:

1. I have been employed by Hamot Medical Center ("Hamot") since June 1986 and since October 2005, I have served as HR Business Partner.
2. In my capacity as HR Business Partner, I am personally familiar with the relationship existing between Hamot and the following doctors: John Lubahn, M.D., John Hood, M.D., Gary Cortina, M.D., Mary Beth Cermack, M.D., D. Patrick Williams, M.D., David Babins, M.D., Mark Suprock, M.D., Nick Stefanovski, M.D., John Kastrup, M.D., and Vincent Rogers, M.D.
3. None of the above-listed doctors are employed by Hamot as physicians. John Hood, M.D. is employed by Hamot as an information systems physician consultant for which he is compensated \$10,000 annually and John Lubahn, M.D. is employed as Director of Hamot's Orthopaedic Residency Program for which he is compensated \$95,000 per year.

On this, the 20th day of April 2006, Dana Ashley, the undersigned, deposes and states that the facts set forth in the foregoing Affidavit of Dana Ashley are true and correct to the best of her knowledge, information and belief, subject to the

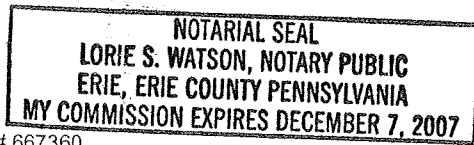


penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.


Dana Ashley

COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF ERIE) SS:

On the 20th day of April, 2006, before me, personally appeared Dana Ashley, to me known to be the person named herein, who executed the foregoing Affidavit and acknowledged to me that she has read the foregoing Affidavit, understands the contents thereof and that she voluntarily executed the same.



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Lorie S. Watson
Notary Public